

BENJAMIN B. WAGNER
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR S 10-0223 JAM
)	
Plaintiff,)	
)	
v.)	
)	
HODA SAMUEL,)	STIPULATION AND
CONNIE DEVERS,)	ORDER FOR CONTINUANCE OF
CHARLES ROBERT MANESS,)	STATUS CONFERENCE
DANA FAULKNER,)	
TRACY PAINTER,)	
YGNACIA BRADFORD,)	
SEAN PATRICK GJERDE,)	
NICOLE DAWSON, and)	
RONALD BURRIS, JR.,)	Date: October 26, 2010
)	Time: 9:30 a.m.
Defendants.)	Hon. John A. Mendez
_____)	

It is hereby stipulated and agreed to between the United States of America through PHILIP A. FERRARI, Assistant United States Attorney, and defendants HODA SAMUEL, CONNIE DEVERS, CHARLES ROBERT MANESS, DANA FAULKNER, TRACY PAINTER, YGNACIA BRADFORD, SEAN PATRICK GJERDE, NICOLE DAWSON, and RONALD BURRIS, JR., by and through their respective counsel, that the status conference in the above-captioned matter set for Tuesday, September 14, 2010, be continued to Tuesday, October 26, 2010, at 9:30 a.m.

The parties request that the Court exclude from calculation under the Speedy Trial Act the time from the date of the originally set status conference, September 14, 2010, through the date of the status conference set for October 26, 2010, pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(ii) and (iv) [complexity and reasonable time to prepare] (Local Codes T2 and T4). Since the Indictment was filed on June 10, 2010, the government has produced over 34,000 documents to counsel for the defendants. The parties stipulate that the ends of justice are served by the Court excluding such time, so that each defense counsel may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Specifically, each defendant agrees that his or her counsel needs time to review the discovery, investigate the facts underlying this case and seek possible resolution. Additionally, the parties stipulate that the above-captioned case is unusual and complex such that it is unreasonable to expect adequate preparation for pretrial proceedings, or for a potential trial within the time limits established by the Speedy Trial Act.

IT IS SO STIPULATED.

DATE: September 13, 2010 By: /s/ Philip A. Ferrari
PHILIP A. FERRARI
Assistant U.S. Attorney

DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
SCOTT TEDMON
Counsel for Defendant
HODA SAMUEL

DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
MARK REICHEL
Counsel for Defendant
CONNIE DEVERS

1 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
2 DONALD HELLER
3 Counsel for Defendant
4 CHARLES ROBERT MANESS

5 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
6 THOMAS JOHNSON
7 Counsel for Defendant
8 SEAN GJERDE

9 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
10 MICHAEL PETRIK, JR.
11 Counsel for Defendant
12 TRACY PAINTER

13 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
14 ADANTE DE POINTER
15 Counsel for Defendant
16 DANA FAULKNER

17 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
18 MICHAEL BIGELOW
19 Counsel for Defendant
20 NICOLE DAWSON

21 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
22 JOSEPH J. WISEMAN
23 Counsel for Defendant
24 YGNACIA BRADFORD

25 DATE: September 13, 2010 By: /s/ Philip A. Ferrari for
26 MICHAEL E. HANSEN
27 Counsel for Defendant
28 RONALD BURRIS, JR.

IT IS SO FOUND AND ORDERED.

DATED: September 13, 2010
/s/ John A. Mendez
HON. JOHN A. MENDEZ
UNITED STATES DISTRICT JUDGE